

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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BLUE HEN HOTEL, LLC,	)	
	)	Plaintiff,
	)	CIVIL ACTION NO. 05-221 (SLR)
v.	)	JURY TRIAL DEMANDED
CHARLES P. ARENA,	)	
	)	Defendant.
	)	

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**PLAINTIFF'S FIRST SET OF DOCUMENT  
REQUEST TO DEFENDANT**

Plaintiff Blue Hen Hotel, LLC, hereby demands production of the following documents and things for inspection and copying within thirty days hereof at the office of their counsel, White and Williams LLP, 824 N. Market Street, Suite 902, Wilmington, DE 19899. Production is to be made in accordance with the provisions of the Federal Rules of Civil Procedure. Plaintiff incorporates by this reference the Definitions set forth in Plaintiff's First Set of Interrogatories to Defendant as if set forth at length herein.

1. All documents identified in response to Plaintiff's First Set of Interrogatories to Defendant.
2. All invoices, bills or statements from any accountant for services rendered to you from January 1, 2000 to the present.
3. All correspondence or other documents concerning the relationship of, by, between or among:
  - (a) You;
  - (b) Arena & Co., Inc.;

- (c) C. Arena & Co., Inc.;
- (d) Arena Construction Management;
- (e) Arena Consulting Group; and
- (f) Arena Property Management Company.

4. All documents relating to your past or present ownership interest in any company, including but not limited to an affiliate as that term has been defined.
5. All documents relating to your past or present interest in any partnership.
6. All documents relating to any assets, including but not limited to loans, notes, receivables or the like, received by or given to you from and to each of the following, and to the extent that you claim to have given value in return for such asset, all documents relating to such "value given":
  - (a) Arena & Co., Inc.;
  - (b) C. Arena & Co., Inc.;
  - (c) Arena Construction Management;
  - (d) Arena Consulting Group;
  - (e) Arena Property Management;
  - (f) Any other company for which you are an affiliate as that term has been defined.
7. All documents relating to the Blue Hen project or work performed for Blue Hen.
8. All documents relating to payments received from Blue Hen.
9. All documents relating to the payment of subcontractors or other persons working on the Blue Hen project.
10. All documents relating to the business of C. Arena & Co., Inc., including but not limited to any minutes of Board Meetings, minutes of shareholders meetings, shareholder approval of loans or other business transactions, dividends declared or paid, distributions, or return of capital.

11. All documents relating to:

- (a) the capitalization of Arena & Co., Inc.;
- (b) the identity of all owners, officers, directors and managing agents or anyone who ever held such a position for Arena & Co., Inc. from January 1, 1998 to the present;
- (c) the operating or business function; and
- (d) the identity of any Certified Public Accountant and/or Certified Public Accounting Firm who has conducted an audit of Arena & Co., Inc. from January 1, 1998, to the present, or who has been employed by Arena & Co., Inc., and any report or analysis which was prepared by such Accountant.

12. All documents relating to:

- (a) the capitalization of C. Arena & Co., Inc.;
- (b) the identity of all owners, officers, directors and managing agents or anyone who ever held such a position for C. Arena & Co., Inc. from January 1, 1998 to the present;
- (c) the operating or business function; and
- (d) the identity of any Certified Public Accountant and/or Certified Public Accounting Firm who has conducted an audit of C. Arena & Co., Inc. from January 1, 1998, to the present, or who has been employed by C. Arena & Co., Inc., and any report or analysis which was prepared by such Accountant.

13. All documents relating to:

- (a) the capitalization of Arena Construction Management;
- (b) the identity of all owners, officers, directors and managing agents or anyone who ever held such a position for Arena Construction Management from January 1, 1998 to the present;
- (c) the operating or business function; and
- (d) the identity of any Certified Public Accountant and/or Certified Public Accounting Firm who has conducted an audit of Arena Construction Management from January 1, 1998, to the present, or who has been employed by Arena Construction management, and any report or analysis which was prepared by such Accountant.

14. All documents relating to:

- (a) the capitalization of Arena Consulting Group;
- (b) the identity of all owners, officers, directors and managing agents or anyone who ever held such a position for Arena Consulting Group from January 1, 1998 to the present;
- (c) the operating or business function; and
- (d) the identity of any Certified Public Accountant and/or Certified Public Accounting Firm who has conducted an audit of Arena Consulting Group from January 1, 1998, to the present, or who has been employed by Arena Consulting Group, and any report or analysis which was prepared by such Accountant.

15. All documents relating to:

- (a) the capitalization of Arena Property Management Company;
- (b) the identity of all owners, officers, directors and managing agents or anyone who ever held such a position for Arena Property Management Company from January 1, 1998 to the present;
- (c) the operating or business function; and
- (d) the identity of any Certified Public Accountant and/or Certified Public Accounting Firm who has conducted an audit of Arena Property Management Company from January 1, 1998, to the present, or who has been employed by Arena Property Management Company, and any report or analysis which was prepared by such Accountant.

16. All documents relating to any annual reports, financial statements or other documents filed by you or signed by you with any state or regulatory authority from January 1, 1998 to the present.

17. All documents relating to any inter-company transaction by, between or among:

- (a) You;
- (b) Arena & Co., Inc.;
- (c) C. Arena & Co., Inc.
- (d) Arena Construction Management;
- (e) Arena Consulting Group; and
- (f) Arena Property Management Company.

18. All documents relating to any loans by, between or among:

- (a) You;
- (b) Arena & Co., Inc.;
- (c) C. Arena & Co., Inc.
- (d) Arena Construction Management;
- (e) Arena Consulting Group; and
- (f) Arena Property Management Company.

19. All documents relating to any agreement, contract or understanding, whether written, oral or implied by, between or among:

- (a) You;
- (b) Arena & Co., Inc.;
- (c) C. Arena & Co., Inc.
- (d) Arena Construction Management;
- (e) Arena Consulting Group; and
- (f) Arena Property Management Company.

20. All documents relating to the total annual compensation (whether by salary, dividend, income distribution or any other means) received by you from any of the following for each year from January 1, 1998 to the present:

- (a) Arena & Co., Inc.;
- (b) C. Arena & Co., Inc.
- (c) Arena Construction Management;
- (d) Arena Consulting Group; and
- (e) Arena Property Management Company.
- (f) Any other company for which you are an affiliate as that term has been defined.

21. All documents relating to the amount of each distribution or dividend made by you or any other person from January 1, 1998 to the present by:

- (a) Arena & Co., Inc.;
- (b) C. Arena & Co., Inc.
- (c) Arena Construction Management;
- (d) Arena Consulting Group; and
- (e) Arena Property Management Company.
- (f) Any other company for which you are an affiliate as that term has been defined.

22. All documents relating to any guarantee of any obligation, payment or performance by you from January 1, 1998 to the present for:

- (a) Arena & Co., Inc.;
- (b) C. Arena & Co., Inc.
- (c) Arena Construction Management;
- (d) Arena Consulting Group; and
- (e) Arena Property Management Company.
- (f) Any other company for which you are an affiliate as that term has been defined.

23. All documents provided to any person you expect to call as an expert witness at trial.

24. All documents relating to the facts asserted in the Complaint and in any Answer, Affirmative Defenses or other pleading submitted in this action.

25. Any document you anticipate introducing as an exhibit at any trial or hearing in this action.

26. All documents relating to any source of financing or money management for:

- (a) Arena & Co., Inc.;
- (b) C. Arena & Co., Inc.

- (c) Arena Construction Management;
- (d) Arena Consulting Group; and
- (e) Arena Property Management Company.
- (f) Any other company for which you are an affiliate as that term has been defined.

27. All documents relating to any bank accounts or loans for:

- (a) You;
- (b) Arena & Co., Inc.;
- (c) C. Arena & Co., Inc.
- (d) Arena Construction Management;
- (e) Arena Consulting Group; and
- (f) Arena Property Management Company.

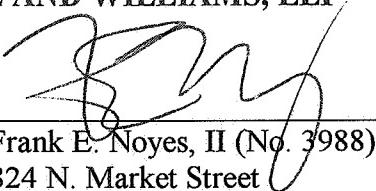
including but not limited to statements, account numbers, cancelled checks, wire authorizations or the like for the period January 1, 1998 to the present.

28. All documents relating to:

- (a) Oldcastle Precast Building Systems;
- (b) All-Span, Inc.;
- (c) First State Construction, Inc.;
- (d) Energy Products 7 Service, Co.; and
- (e) Diversified Construction Staffing, Inc.

**WHITE AND WILLIAMS, LLP**

BY:

  
Frank E. Noyes, II (No. 3988)

824 N. Market Street

Suite 902

Wilmington, DE 19899-0709

(302) 467-4511

*Attorneys for Plaintiff*

*Blue Hen Hotel, LLC*

**Of Counsel:**

Michael N. Onufrak, Esquire  
White and Williams LLP  
1800 One Liberty Place  
Philadelphia, PA 19103-7395  
(215) 864-7174

Dated: March 13, 2006

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FOR THE DISTRICT OF DELAWARE

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BLUE HEN HOTEL, LLC,	)	
	)	CIVIL ACTION NO. 05-CV-00221 (JJF)
Plaintiff,	)	
	)	JURY TRIAL DEMANDED
v.	)	
	)	
CHARLES P. ARENA,	)	
	)	
Defendant.	)	
	)	

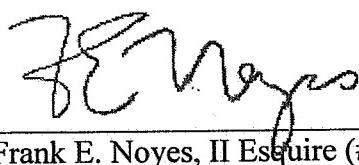
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**CERTIFICATE OF SERVICE**

I, Frank E. Noyes, II, Esquire, hereby certify that on this 13<sup>th</sup> day of March, 2006, I caused a true and correct copy of the foregoing **PLAINTIFF'S FIRST SET OF DOCUMENT REQUESTS TO DEFENDANT** to be served upon counsel by e-filing and in the manner indicated:

**BY HAND**

Adam Balick, Esquire  
Bifferato, Gentilotti, Biden & Balick  
711 N. King Street  
Wilmington, DE 19801



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Frank E. Noyes, II Esquire (#3988)